

SMITH LARSEN & WIXOM

ATTORNEYS
HILLS CENTER BUSINESS PARK
1935 VILLAGE CENTER CIRCLE
LAS VEGAS, NEVADA 89134
(702) 252-5002 • (702) 252-5006

1 Kent F. Larsen, Esq.
2 Nevada Bar No. 3463
3 Katie M. Weber, Esq.
4 Nevada Bar No. 11736
5 SMITH LARSEN & WIXOM
6 1935 Village Center Circle
7 Las Vegas, Nevada 89134
8 Tel.: (702) 252-5002
9 Fax: (702) 252-5006
10 Email: kfl@slwlaw.com
11 kw@slwlaw.com
12 Attorneys for Defendant/Counterclaimant
13 JPMorgan Chase Bank, N.A.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SHIREHAMPTON DRIVE TRUST,

Plaintiff,

v.

JPMORGAN CHASE BANK, NATIONAL
ASSOCIATION; MTC FINANCIAL INC.
DBA TRUSTEE CORPS; LOUISA
OAKENELL; and UNITED STATES OF
AMERICA TREASURY DEPARTMENT,
INTERNAL REVENUE SERVICE,

Defendants.

CASE NO.: 2:16-cv-02276-RFB-GWF

**STIPULATION AND [PROPOSED]
ORDER EXTENDING DEADLINE TO
FILE REPLIES IN SUPPORT OF
MOTIONS FOR SUMMARY
JUDGMENT**

(First Request)

JPMORGAN CHASE BANK, N.A.,

Counterclaimant,

v.

SHIREHAMPTON DRIVE TRUST; DOES
1 through 10, inclusive; and ROE
CORPORATIONS 1 through 10, inclusive,

Counterdefendants.

1 Plaintiff Shirehampton Drive Trust (“Plaintiff”), and Defendants JPMorgan Chase
2 Bank, N.A. (“Chase”) and United States of America (“United States”), by and through their
3 respective counsel of record, hereby agree as follows:
4

5 1. On September 24, 2018, Plaintiff,¹ Chase, and United States each filed motions
6 for summary judgment in this action. [ECF Nos. 42, 43, 44, and 45.]

7 2. On October 12, 2018, United States filed its opposition to Plaintiff’s Motion
8 for Summary Judgment against the IRS. [ECF No. 47.]

9 3. On October 15, 2018, Plaintiff filed its separate oppositions to Chase’s and
10 United States’ motions for summary judgment, and Chase filed its opposition to Plaintiff’s
11 motion for summary judgment. [ECF Nos. 48, 49, and 50.]

12 4. Accordingly, United States’ reply brief is currently due to be filed on or before
13 October 26, 2018, and Plaintiff’s and Chase’s respective reply briefs are currently due to be
14 filed on or before October 29, 2018. (*See Local Rule 7-2(b).*)

15 5. Counsel for Chase will be out of the office October 19, 2018 through October
16 29, 2018, and has therefore requested a brief two-week extension of the reply deadline. For
17 the sake of consistency, the parties desire to modify the deadline for each of the parties’ reply
18 briefs from October 26, 2018 (in the case of United States’ deadline) and October 29, 2018 (in
19 the case of Plaintiff’s and Chase’s deadline) to **November 13, 2018**.

20 . . .
21

22 . . .
23

24 . . .
25

26

27

28

¹ Plaintiff filed separate motions against Chase and United States. [*See ECF Nos. 44 and 45.*]

SMITH LARSEN & WIXOM

ATTORNEYS
HILLS CENTER BUSINESS PARK
1935 VILLAGE CENTER CIRCLE
LAS VEGAS, NEVADA 89134
(702) 252-5002 • (702) 252-5006

1 6. The parties respectfully submit that the instant stipulation is supported by a
2 showing of good cause, and the extension set forth herein is not requested for purposes of
3 delay.
4

5 Dated this 23rd day of October, 2018.

6 SMITH LARSEN & WIXOM

7 /s/ Katie M. Weber
8 Kent F. Larsen, Esq.
9 Nevada Bar No. 3463
10 Katie M. Weber, Esq.
11 Nevada Bar No. 11736
12 1935 Village Center Circle
13 Las Vegas, Nevada 89134
14 Attorneys for Defendant/Counterclaimant
15 JPMorgan Chase Bank, N.A.

Dated this 23rd day of October, 2018.

LAW OFFICES OF MICHAEL F. BOHN,
ESQ., LTD.

/s/ Adam R. Trippiedi
Michael F. Bohn, Esq.
Nevada Bar No. 1641
Adam R. Trippiedi, Esq.
Nevada Bar No. 12294
2260 Corporate Cir., Suite 480
Henderson, Nevada 89074
Attorney for Plaintiff/Counterdefendant
Shirehampton Drive Trust

Dated this 18th day of October, 2018.

RICHARD E. ZUCKERMAN
Principal Deputy Assistant Attorney General


BORIS KUKSO
Trial Attorney, Tax Division
U.S. Department of Justice
P.O. Box 683
Washington, D.C. 20044
202-353-1857 (v)
202-307-0054 (f)
Boris.Kukso@usdoj.gov

IT IS SO ORDERED:


RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED this 25th day of October, 2018.